## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE	)	Case No. 18-20912
Jessica N. Cyphert, Debtor	)	Chapter 13
Jessica N. Cyphert, Movant	)	
Vs.	)	Related to Trustee's Cert of Default
Ronda J. Winnecour, Trustee, Respondent	)	Filed at Document No. 65

## NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS

- 1. Debtor proposes to cure the plan default as pleaded in the Trustee's Certificate of Default.
- 2. The cure shall be effectuated as follows: institute a wage attachment upon her new employment with the Allegheny Clinic (wage order has been entered) and apply for a mortgage loan modification with Midfirst Bank (which has recently been submitted outside of the LMP).
- 3. All Objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtor and Chapter 13 Trustee. Untimely Objections will not be considered. Any creditor who files a timely Objection to the cure must appear at the scheduled Conciliation Conference on the proposed cure.
- 4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on March 2, 2023 at 9:00 a .m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <a href="http://www.ch13pitt.com/calendar/several days">http://www.ch13pitt.com/calendar/several days</a> before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <a href="http://www.ch13pitt.com/">http://www.ch13pitt.com/</a> and to comply with the procedures set forth at that site for conference participation.

RESPECTFULLY SUBMITTED, this 24<sup>th</sup> day of January 2023.

Attorney for Debtor

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